

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
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DELETE, DELETE, DELETE	)	GN Docket No. 25-133
	)	
	)	

COMMENTS OF ASTRANIS SPACE TECHNOLOGIES CORP.

Astranis Space Technologies Corp. (“Astranis”) submits these comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Public Notice dated March 12, 2025, which seeks public input on eliminating rules that create unnecessary regulatory burdens and unfairly disadvantage American-owned businesses.¹

Astranis is an American satellite company with over 420 employees, all U.S. Persons based in the United States.² Astranis designs, builds, and operates small satellites for geostationary orbit, and deploys them for a variety of missions in the United States and around the world. By building its satellites in its own factory in the United States, Astranis is revolutionizing the geostationary satellite market by drastically reducing the time to orbit for each satellite and enabling tailored spacecraft to meet each customer’s needs. Five Astranis small geostationary communications (“MicroGEO”) satellites are in orbit today, and Astranis has publicly announced a number of contracts for technology development, demonstration, and next-generation system design with the U.S. Space Force and other parts of the U.S. Government.

As an American satellite company, we are encouraged to see the *Delete, Delete, Delete*

¹ *In Re: Delete, Delete, Delete*, Public Notice, GN Docket No. 25-133, DA 25-219 (rel. March 12, 2025) (“*Delete Delete Delete Public Notice*”) at 1 and 4.

² 22 CFR § 120.62

Public Notice and related efforts by the Commission to improve the competitiveness of the American telecommunications industry on the global stage and enhance the ability of the U.S. regulatory regime to support and foster growth of American satellite companies. There are significant opportunities to modernize the American regulatory framework — and if executed well, these modernization efforts can bring more high-tech jobs to America, allow private industry to better assist the U.S. and our allies around the world, and enable America’s manufacturing and technology industries to bring incredible value to the American economy and the American people.

In that spirit, Astranis urges the Commission to adopt a forward-looking, bold approach that (1) eliminates the surety bond requirement for geostationary satellite orbit (GSO) operators; and (2) updates gateway earth station siting rules to support next-generation capabilities. Addressing these two matters as described below would significantly advance the Commission’s intent to undertake “deregulatory initiatives that would facilitate and encourage American firms’ investment in modernizing their networks, developing infrastructure, and offering innovative and advanced capabilities.”³

I. Eliminating The Surety Bond Requirement for Geostationary Satellite Operators

The most necessary area of reform is the Commission’s surety bond requirement under 47 C.F.R. § 25.165. As currently structured, the bond fails to achieve its intended goal and serves as a high barrier to entry for new, innovative American firms.

For large, established geostationary satellite operators, the surety bond does not deter spectrum warehousing because large balance sheets make posting a \$1 to \$3 million bond a simple exercise, just a call to a banker and a small monthly fee. This is a small hurdle to clear. It does not lock up capital in any meaningful way, and therefore does not act to deter spectrum warehousing

³ See *Delete, Delete, Delete Public Notice* at 1.

for larger, established players.

But the bond is not without teeth: it has a disproportionate capital-constraining effect on new firms that seek to enter and compete in the satellite market. New entrants without long-term banking relationships (and large balance sheets) must not only pay a percentage fee to a bank for issuing the bond, but also must set aside substantial collateral—capital that could otherwise support core business activities in the United States like hiring engineers, expanding manufacturing facilities, or building additional satellites. In the case of Astranis’s first MicroGEO satellite, Arcturus, posting a bond meant setting aside millions of dollars that could not be used to grow the business.⁴

Furthermore, the Commission must consider the surety bond in conjunction with its regulatory fees, and their combined financial burden on applicants. The Commission now appears poised to apply regulatory fees to authorized but not yet operational satellites.⁵ In addition to maintaining a \$1 to 3 million bond, this means that GSO operators will also pay a yearly regulatory fee in excess of \$100K before even launching a satellite. It is important to weigh this financial burden against the current state of GSO satellite licensing in the United States – the availability of and demand for slots. The domestic GSO satellite arc is largely saturated in many frequency bands and is dominated by satellites operated by the two largest GSO satellite operators – SES and Intelsat.⁶ These two operators are soon to be merged into a single giant satellite operator based in Luxembourg.⁷ Other traditional GSO operators are highlighting their shift to focus on

⁴ The Arcturus satellite is licensed under call sign S3092.

⁵ *Assessment and Collection of Space and Earth Station Regulatory Fees for Fiscal Year 2024*, Further Notice of Proposed Rulemaking, FCC 25-11 (rel. Feb 25, 2025), para. 23.

⁶ For example, considering GSO slots from 70 to 130 W over the United States, the FCC’s Approved Space Station List shows that 17 out of 31 available slots are licensed to either SES or Intelsat, including Horizons 4, a joint venture between Intelsat and JSAT. Available at <https://www.fcc.gov/approved-space-station-list>, last visited April 10, 2025.

⁷ *See Applications Filed for Transfer of Control of Intelsat to SES*, DA 24-872 (SB Aug. 29, 2024).

non-geostationary satellite orbit (“NGSO”) systems.⁸ Considering the financial burden on new, innovative American companies and how the GSO landscape has changed in the more than 20 years since the FCC first adopted surety bonds in 2003, it is timely to consider the ongoing necessity for a surety bond.⁹

It is also worth noting that levying a surety bond on a *per satellite* basis for geostationary satellites means that operators like Astranis who seek to build smaller geostationary satellites—which have less throughput and therefore generate less revenue than larger satellites—are disproportionately impacted by the surety bond requirements. Simply, if a single large satellite from one operator offers 100 Gbps of throughput, and ten small satellites from another operator collectively offer 100 Gbps, the small satellite operator would have to post a 10x bigger bond to offer the same customer-facing service in the end.

The effect of keeping a bond like this in place is the flight of new, innovative operators from America to other countries or other regulatory jurisdictions. We are not aware of any other nation that requires a bond for spectrum filings, which makes the United States unique not only among the broader population of nations, many of which have significantly less activity than the United States, but also among other sophisticated spectrum regulators like the United Kingdom’s Ofcom. If nothing else, the fact that the United States alone levies this bond means that U.S. operators must choose between accepting the disadvantageous bond requirement or seeking licensing in other countries.

⁸ See <https://spacenews.com/geopolitical-shifts-boost-lightspeed-as-starlink-eats-into-telesats-geo-business/> “Telesat is also moving more of its aging fleet into an inclined orbit, and [Daniel] Goldberg noted how the company has not ordered a new GEO satellite in nine years, because “we haven’t been able to close a compelling business case for a new GEO satellite in quite some time.”” See also <https://spacenews.com/eutelsat-adapts-geo-strategy-as-starlink-reshapes-satellite-connectivity/> “However, she [Eva Berneke] also said Eutelsat is closely reviewing future GEO investment needs amid a general shift in the market toward LEO for connectivity.”

⁹ *Amendment of the Commission’s Space Station Licensing Rules and Policies*, First Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 10824, para. 166 (2003).

To address these concerns, the Commission should eliminate the surety bond requirement.

II. Updating Gateway Earth Station Siting Rules for Next-Generation Capabilities

The Commission should reform its restrictive gateway earth station siting rules by 1) modifying the three-per-county limit in 47 C.F.R. §§ 25.136(a)(4)(i), 25.136(c)(1) and 25.136(d)(1); and 2) eliminating overly complicated and unnecessary determinations in 47 C.F.R. §§ 25.136(a)(4)(ii) and (iii), 25.136(c)(2), 25.136(c)(3), 25.136(d)(2) and 25.136(d)(3) regarding population and infrastructure coverage of certain emitted power levels around each earth station. The three-per-county rule imposes an arbitrary cap on Ka- and Q/V-band earth stations, which is insufficient for modern constellations that often require multiple high-throughput links per geographic region. Raising the limit to at least ten gateways per county would better support infrastructure expansion by satellite systems and enable increased competition. The complex determinations regarding population and infrastructure coverage of certain power flux density levels around each earth station have proved virtually impossible for FCC staff to arbitrate quickly and have led to significant processing delays of earth station applications. While the FCC's recent public notice clarifying the assumptions to be used in these calculations is a positive step,¹⁰ the limited terrestrial deployments in these high frequency bands in the 10 years since the adoption of these rules demonstrate that such complex determinations are unnecessary. Considering these factors, Astranis urges the Commission to move expeditiously to simplify § 25.136 by deleting these provisions described herein.

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¹⁰ See Space Bureau Updates its Guidance on Siting Methodologies for Earth Stations Seeking to Operate in the 24.75-25.25 GHz, 27.5-28.35 GHz, 37.5-40 GHz, 47.2-48.2 GHz, and 50.4-51.4 GHz bands to Demonstrate Compliance with Section 25.136, DA 25-206 (SB March 10, 2025).

Both of these proposals advance a common goal: enabling American satellite firms to compete on a level playing field both within the United States and abroad. These actions would eliminate regulations that “impose costs unequally on large and small businesses” and that “unfairly disadvantage American-owned businesses” consistent with the Commission’s stated goals.

Astranis is proud to be an American satellite company, and we urge the Commission to “delete, delete, delete” those rules that no longer serve America’s economic, political, and national-security goals.

Respectfully submitted,

/s/ Christian Keil

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